1 ROBERT W. FREEMAN 2 Nevada Bar No. 3062 PRISCILLA L. O'BRIANT Nevada Bar No. 10171 LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 5 Telephone: (702) 893-3383 Fax: (702) 893-3789 E-Mail: Robert.Freeman@lewisbrisbois.com E-Mail: Priscilla.Obriant@lewisbrisbois.com 7 Attorneys for National Casualty Company 8 UNITED STATES DISTRICT COURT 9 **DISTRICT OF NEVADA** 10 PHILIP BOUCHARD, an individual, CASE NO.: 2:20-cy-01084- JCM-BNW 11 Plaintiff, STIPULATION AND ORDER 12 EXTENDING THE DEFENDANT NATIONAL CASUALTY COMPANY'S VS. 13 TIME TO RESPOND TO COMPLAINT TO JULY 17, 2020 NATIONAL CASUALTY COMPANY, a 14 foreign corporation; COAST NATIONAL INSURANCE COMPANY dba FOREMOST 15 INSURANCE GROUP, a foreign entity; SELMAN BREITMAN LLP, a foreign limit 16 liability partnership corporation; DOES 1 through 10, and ROE CORPORATIONS 1 17 through 20, inclusive, 18 Defendants. 19 Philip Bouchard ("Plaintiff") and National Casualty Company ("NCC"), by and through 20 their undersigned counsel of record, agree that NCC shall have an additional four days of time 21 from July 13, 2020 through and including July 17, 2020, in which to file its responsive pleading in 22 response to the Amended Complaint (Doc. 1-1) filed in this action by Plaintiff. 23 This is the first extension of time requested by counsel for filing Defendant NCC's 24 response to Plaintiff's Amended Complaint. 25 26 27 28

BRISBOIS
BISGAARD
& SMITH LIP
ATTORNEYS AT LAW

4814-8289-4530.1

1	Reasons for Extension	
2	NCC requests a brief extension to complete their review of the averments contained in the	
3	Amended Complaint and prepare its response. Therefore the parties have agreed to this extension.	
4	This brief extension will not prejudice any party or cause undue delay.	
5	Dated this 13 th day of July, 2020.	Dated this 13 th day of July, 2020.
6	/s/ Priscilla L. O'Briant	/s/ Jordan P. Schnitzer
7	ROBERT W. FREEMAN, ESQ.	JORDAN P. SCHNITZER, ESQ.
8	Nevada Bar No. 3062 PRISCILLA L. O'BRIANT, ESQ.	Nevada Bar No. 10744 THE SCHNITZER LAW FIRM
9	Nevada Bar No. 10171	9205 W. Russell Road, Suite 240
10	LEWIS BRISBOIS BISGAARD & SMITH 6385 S. Rainbow Blvd., Suite 600	Las Vegas, NV 89148 Attorney for Plaintiff
11	Las Vegas, Nevada 89118 Attorneys for NCC	
	Thiorneys for IVCC	
12	ORDER	
13		
14	IT IS SO ORDERED.	4045 July
15	Da	ated this 16th day of July, 2020.
16	Denbucken	
17	UI	NITED STATES DISTRICT COURT JUDGE
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28	4814-8289-4530.1	2

& SМПН ШР

Case 2:20-cv-01084-JCM-BNW Document 17 Filed 07/16/20 Page 3 of 5

Archived: Monday, July 13, 2020 2:23:49 PM

From: Jordan Schnitzer

Sent: Monday, July 13, 2020 2:01:52 PM

To: Cordell, Anne Cc: O'Briant, Priscilla

Subject: [EXT] RE: SAO - Answer BOUCHARD v National Casualty

Sensitivity: Normal

You can add my e-signature.

Jordan P. Schnitzer, Esq.





The SchnitzerLawFirm.com
Tel 702.960.4050 | Fax 702.960.4092
Email <u>Jordan@The SchnitzerLawFirm.com</u>
9205 West Pussell Poad | Suite 240 | Las Vegas Nex

 $9205~\mathrm{West}$ Russell Road | Suite 240 | Las Vegas, Nevada89148

This electronic message and any attachments come from a lawfirm and may contain information that is or may be legally privileged, confidential, proprietary in nature, or otherwise protected by lawfrom disclosure. The message and attachments are intended only for the use of the addressee. If you are not the intended recipient, please contact me so that any mistake in transmission can be corrected and then delete the message and any attachments from your system. Thank you.

From: Cordell, Anne < Anne. Cordell@lewisbrisbois.com >

Sent: Monday, July 13, 2020 1:45 PM

To: Jordan Schnitzer < Jordan@TheSchnitzerLawFirm.com> **Cc:** O'Briant, Priscilla < Priscilla. Obriant@lewisbrisbois.com> **Subject:** RE: SAO - Answer BOUCHARD v National Casualty

The WORD document link is below; I have also attached it I pdf.



Anne Cordell - Assistant to:

Priscilla L. O'Briant Damon Stemen Tara Teegarden

<u>Anne.cordell@lewisbrisbois.com</u> T: 702.693.4324 F: 702.893.3789

Case 2:20-cv-01084-JCM-BNW Document 17 Filed 07/16/20 Page 4 of 5 6385 S. Rainbow Blvd., Ste. 600, Las Vegas, NV 89118 | LewisBrisbois.com

Representing clients from coast to coast. View our nationwide locations.

This e-mail may contain or attach privileged, confidential or protected information intended only for the use of the intended recipient. If you are not the intended recipient, any review or use of it is strictly prohibited. If you have received this e-mail in error, you are required to notify the sender, then delete this email and any attachment from your computer and any of your electronic devices where the message is stored.

From: Jordan Schnitzer [mailto:Jordan@TheSchnitzerLawFirm.com]

Sent: Monday, July 13, 2020 1:42 PM

To: Cordell, Anne **Cc:** O'Briant, Priscilla

Subject: [EXT] RE: SAO - Answer BOUCHARD v National Casualty



Nothing is attached.

Jordan P. Schnitzer, Esq.







The SchnitzerLawFirm.com
Tel 702.960.4050 | Fax 702.960.4092
Email Jordan@The SchnitzerLawFirm.com
9205 West Russell Road | Suite 240 | Las Vegas, Nevada 89148

This electronic message and any attachments come from a lawfirm and may contain information that is or may be legally privileged, confidential, proprietary in nature, or otherwise protected by lawfrom disclosure. The message and attachments are intended only for the use of the addressee. If you are not the intended recipient, please contact me so that any mistake in transmission can be corrected and then delete the message and any attachments from your system. Thank you.

From: Cordell, Anne < Anne. Cordell@lewisbrisbois.com >

Sent: Monday, July 13, 2020 1:40 PM

To: Jordan Schnitzer < <u>Jordan@TheSchnitzerLawFirm.com</u>>
Cc: O'Briant, Priscilla < <u>Priscilla.Obriant@lewisbrisbois.com</u>>
Subject: SAO - Answer BOUCHARD v National Casualty

Mr. Schnitzer, attached please find stipulation and order extending National Casualty's time to respond to the Complaint July 17, 2020.

Please advise if we have your approval to use your e-signature and file with the Court today. Thank you.

SAO Answer BOUCHARD v National Casualty.docx OPEN VIEW GO TO